

### **REMARKS**

Claims 1 – 86 are pending and under consideration in the above-identified application, and Claims 28 – 76 were previously withdrawn.

In the Office Action, Claims 1 – 27 and 77 – 86 were rejected.

In the Amendment, Claims 1, 4 – 6, 9 – 10, 12, 14 – 16, 18 – 20, 22, 25 – 27, and 77 – 84 are amended, and Claims 2, 3, 7 – 8, 13, 24, and 28 – 76 are cancelled. No new matter has been introduced as a result of this Amendment.

Accordingly, Claims 1, 4 – 6, 9 – 12, 14 – 23, 25 – 27 and 77 – 86 are at issue.

#### **I. 35 U.S.C. § 101**

Claims 1-5 were rejected under 35 U.S.C. § 101.

As requested by the Examiner, Applicants have amended Claim 1 to recite that the execution of the script generates a signal configured to control a device. As such, Applicants submit that this Claim 1 amendment result in a useful, concrete and tangible result.

Accordingly, Applicants respectfully request withdrawal of this rejection.

#### **II. 35 U.S.C. § 112 Indefiniteness Rejection of Claims**

Claims 1-27 and 77-86 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

As requested by the Examiner, Applicants have appropriately amended claims rejected as indefinite.

Accordingly, Applicants respectfully request that these claim rejections be withdrawn.

#### **III. 35 U.S.C. § 103 Obviousness Rejection of Claims 1-10, 12-22, 24-27 and 77-86**

Claims 1-10, 12-22, 24-27 and 77-86 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Britton (U.S. Patent No. 6,591,289) in view of Harrington et al. ("Harrington") (U.S. Patent No. 6,775,820) and Ian Douglas Agranat ("Engineering Web Technologies for

Embedded Applications,” IEEE Internet Computing, Vol. 2, Issue 3, May/June 1998, pp. 40-45, hereafter “Agranat.” Although Applicants respectfully traverse this rejection, Claims 1, 6, 10 and 22 have been amended to clarify the invention and remove any ambiguities that may have been at the basis of this claim rejection.

Claim 1 recites "An apparatus comprising: a receiving unit for receiving a document and a script as received data, the document including a script calling portion; a memory for storing at least the script of the received data, the memory being located on a server configured to receive and send data to a client; computer-readable code for substituting the script calling portion in the document with a portion for calling the script stored in said memory; and computer-readable code configured to execute the script stored in memory in response to a request from the client, wherein, the execution of the script generates a signal to control a device."

In the office action, the Examiner admits that Britton does not teach script substitution, but instead reasserts that Harrington discloses this limitation. Applicants again respectfully disagree. As Applicants have explained previously, Harrington does not teach "substituting the script calling portion in the document with a portion for calling the script stored in said memory." That is, in Harrington the script calling portion in the document is not substituted by another script stored in the memory. In fact, Harrington discloses that a script may be re-coded if it is not compatible with an operating system. Specifically, Harrington teaches that a web-based application using JavaScript can be re-coded in Visual Basic Script so that the application is compatible with a browser on an OS/2 operating system. Thus, Harrington merely teaches that one code of a given script is replaced with another code of the same given script.

As the Examiner pointed out, Harrington states, in column 7, lines 25 – 38, that:

“In the case of JAVASCRIPT 1.2 that is determined to submit a form (526), the JAVASCRIPT 1.2 component is re-coded using HTML (528). In the case of a JAVASCRIPT 1.2 component that does not redirect on timeout, then recoding is performed using HTML. If the JAVASCRIPT 1.2 component does redirect on timeout, then the JAVASCRIPT 1.2 is re-coded using HTML to redirect on timeout. In the case of JAVASCRIPT 1.2 that redirects to a timeout page, the function can be re-coded using standard HTML, such as: <meta http-equiv="Refresh" content="1;URL=x.cgi">, where x.cgi is the target page and "1" is the allotted time. To preserve the parameterization of the timeout, the "1" can be substituted with a server-side VISUAL BASIC Script that compiles the page to include the value of the parameter.”

That is, Harrington teaches re-coding an original JavaScript into an HTML Script or a VISUAL BASIC Script while preserving the intended application of the original JavaScript. Claim 1, however, recites "substituting the script calling portion in the document with a portion for calling the script stored in said memory."

Thus, Claim 1 is patentable over Britton, Harrington and Agranat, taken singly or in combination with each other, as are the dependent claims for at least the same reasons.

Claims 6, 10 and 22, which recite the same distinguishable limitation as that of Claim 1, are also patentable over the cited references, as are their corresponding dependent claims for at least the same reasons.

#### **IV. 35 U.S.C. § 103 Obviousness Rejection of Claims 11 and 23**

Claims 11 and 23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Britton (U.S. Patent No. 6,591,289) in view of Harrington et al. (U.S. Patent No. 6,775,820) and Ian Douglas Agranat (“Engineering Web Technologies for Embedded Applications,” IEEE Internet Computing, Vol. 2, Issue 3, May/June 1998, pp. 40-45, hereafter “Agranat”, and Bickmore et al. (“Bickmore”) (U.S. Patent No. 6,857,102) Applicant respectfully traverses this rejection.

Claims 11 and 23 are dependent on Claims 10 and 22 shown above to be patentable over Britton, Harrington and Agranat. Moreover, in addition to these three references Bickmore fails to teach or suggest "substituting the script calling portion in the document with a portion for calling the script stored in said memory." As such, Claims 10 and 22 are also patentable over Britton, Harrington, Agranat, and Bickmore, as are their respective dependent Claims 11 and 23 for at least the same reasons.

Accordingly, Applicants respectfully request that these claim rejections be withdrawn.

**V. Conclusion**

In view of the above amendments and remarks, Applicant submits that Claims 1, 4 – 6, 9 – 12, 14 – 23, 25 – 27 and 77 – 86 are clearly allowable over the cited prior art, and respectfully requests early and favorable notification to that effect.

Respectfully submitted,

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